



DISTRICT OF NEW JERSEY  
UNITED STATES BANKRUPTCY COURT

**Caption in Compliance with D.N.J. LBR 9004-2(c)**

Richard Gerbino., Esq. (ID #057351993)

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A LLP Formed in the State of New York#

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Attorneys for Creditor, Peritus Portfolio Services  
as servicer for Wollemi Acquisitions, LLC,  
successor to Santander Consumer USA, Inc.

In Re:

JASON C. PESCH,

Debtor.

Order Filed on November 15, 2021  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

Case No.: 19-24544-JKS

Judge.: John K. Sherwood

Chapter: 13

**CONSENT ORDER RESOLVING MOTION FOR RELIEF FROM AUTOMATIC STAY  
AND CO DEBTOR STAY**

The relief set forth on the following pages, numbered two (2) through four (4) is hereby  
ORDERED.

**DATED: November 15, 2021**

Honorable John K. Sherwood  
United States Bankruptcy Court

WHEREAS, Peritus Portfolio Services as servicer for Wollemi Acquisitions, LLC, successor to Santander Consumer USA, Inc. (hereinafter "creditor") moved for an Order, pursuant to 11 U.S.C. Section 362(d)(1) and 1301(c), authorizing relief from automatic stay and co-debtor stay, herein; and

WHEREAS, the parties have agreed to resolve the instant dispute by this Consent Order;

NOW THEREFORE, the creditor and debtor hereby agree as follows:

1. That the debtor shall pay the post-petition default of \$5,081.44, while continuing regular monthly payments, by making a series of payments to the creditor as follows:
  - (1) Debtor shall make one payment in the amount of \$958.58 to the creditor no later than October 21, 2021;
  - (2) Debtor shall make one payment in the amount of \$958.58 to the creditor no later than November 21, 2021;
  - (3) Debtor shall make one payment in the amount of \$958.58 to the creditor no later than December 21, 2021;
  - (4) Debtor shall make one payment in the amount of \$958.58 to the creditor no later than January 21, 2022;
  - (5) Debtor shall make one payment in the amount of \$958.58 to the creditor no later than February 21, 2022;
  - (6) Debtor shall make one payment in the amount of \$958.58 to the creditor no later than March 21, 2022;
  - (7) Debtor shall make one payment in the amount of \$958.58 to the creditor no later than April 21, 2022;
  - (8) Debtor shall make one payment in the amount of \$958.58 to the creditor no later than May 21, 2022;
  - (9) Debtor shall make one payment in the amount of \$958.58 to the creditor no later than June 21, 2022;

(10) Debtor shall make one payment in the amount of \$958.58 to the creditor no later than July 21, 2022;

(11) Debtor shall make one payment in the amount of \$958.58 to the creditor no later than August 21, 2022;

(12) Debtor shall make one payment in the amount of \$958.58 to the creditor no later than September 21, 2022;

2. That the debtor shall recommence regular monthly payments in the amount of

\$535.12 each on October 21, 2022.

3. In the event debtor fails to make any payment called for in this Consent Order within thirty (30) days of the due date, Creditor may submit a certification of default and a proposed Order for Relief from Automatic Stay and Co Debtor Stay to the Court and serve a copy of such certification of default upon the debtor and counsel for debtor. Fourteen (14) days after receipt of a certification of default, the Court will enter an Order granting the creditor relief from the automatic stay and co debtor stay unless the debtor has filed an objection to the certification of default specifying reasons for the objection; in which case the Court will set a hearing on the objection.

4. That this order shall survive any conversion of this bankruptcy case.

5. The debtor shall reimburse the creditor through the Chapter 13 Plan for its attorneys' fees in the amount of \$350.00 and costs of \$181.00 for bringing the motion for relief from the automatic stay and co debtor stay.

/s/ Richard Gerbino

Richard Gerbino, Esq.  
Attorney for Creditor  
Schiller, Knapp, Lefkowitz & Hertzel, LLP  
716 Newman Springs Road, Suite 372  
Lincroft, New Jersey 07738

Dated: October 26, 2021

/s/ Russell L. Low

Russell L. Low, Esq.  
Attorney for Debtor  
Low & Low  
505 Main Street, Suite 304  
Hackensack, NJ 07601

Dated: October 20, 2021

In re:  
Jason C. Pesch  
Debtor

Case No. 19-24544-JKS  
Chapter 13

District/off: 0312-2  
Date Rcvd: Nov 17, 2021

User: admin  
Form ID: pdf903

Page 1 of 2  
Total Noticed: 1

The following symbols are used throughout this certificate:

**Symbol** **Definition**

- + Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

**Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Nov 19, 2021:**

Recip ID	Recipient Name and Address
db	+ Jason C. Pesch, 82 Gordon Avenue, Dumont, NJ 07628-1515

TOTAL: 1

**Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.**  
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

## BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, \*duplicate of an address listed above, \*P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

## NOTICE CERTIFICATION

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

**Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: Nov 19, 2021

Signature: /s/Joseph Speetjens

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## CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on November 17, 2021 at the address(es) listed below:

Name	Email Address
Denise E. Carlon	on behalf of Creditor Lakeview Loan Servicing LLC. dcarlon@kmllawgroup.com, bkgroup@kmllawgroup.com
Kevin Gordon McDonald	on behalf of Creditor Lakeview Loan Servicing LLC. kmcdonald@kmllawgroup.com, bkgroup@kmllawgroup.com
Marie-Ann Greenberg	magecf@magtrustee.com
Richard Gerbino	on behalf of Creditor Peritus Portfolio Services as servicer for Wollemi Acquisitions LLC, successor to Santander Consumer USA, Inc. rgerbino@schillernapp.com, kcollins@schillernapp.com;lgadomski@schillernapp.com
Russell L. Low	on behalf of Debtor Jason C. Pesch ecf@lowbankruptcy.com ecf@lowbankruptcy.com;r57808@notify.bestcase.com
U.S. Trustee	

District/off: 0312-2

User: admin

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Date Rcvd: Nov 17, 2021

Form ID: pdf903

Total Noticed: 1

USTPRegion03.NE.EDCF@usdoj.gov

TOTAL: 6